

William Bernarduci (WB 5785)
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LYDIA GARCIA, individually and on :
behalf of all others similarly situated, :
 :
Plaintiff, :
 :
v. :
 :
 :
 :
JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :
 :
Defendants. :
-----X

Case No. 04-CV-8807-KMK

**[PROPOSED] ORDER
APPOINTING ALLAN SCHRAGER
AS LEAD PLAINTIFF AND
APPROVING SELECTION OF
COUNSEL**

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QUANTUM EQUITIES L.L.C., individually:
and on behalf of all others similarly :
situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

Case No. 04-CV-8877-KMK

-----X

-----X
JAMES T. KAHN, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

Case No. 04-CV-8910-KMK

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-----X
JONCO INVESTORS, LLC, individually :
and on behalf of all others similarly :
situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

Case No. 04-CV-9021-KMK

-----X
-----X
JAMES IRVINE, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

JAKKS PACIFIC, INC., JACK :
FRIEDMAN, STEPHEN G. BERMAN, :
and JOEL M. BENNETT, :

Defendants. :

Case No. 04-CV-9078-KMK

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WHEREAS, by his January 4, 2005 Motion, proposed Lead Plaintiff Allan Schrager moved for his appointment as a “lead plaintiff” in the above Class Actions and for approval of Mr. Schrager’s selection of Schatz & Nobel, P.C. as Lead Counsel;

WHEREAS, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), the Court finds that Mr. Schrager is the “most adequate plaintiff”;

NOW THEREFORE, based upon the Declaration of William Bernarduci, the exhibits thereto, and the memorandum of law in support of Mr. Schrager’s Motion;

IT IS HEREBY ORDERED that

1. Mr. Schrager is appointed as Lead Plaintiff; and
2. Mr. Schrager’s selection of Schatz & Nobel, P.C. as Lead Counsel is

hereby approved.

DATED: _____, 2005

SO ORDERED:

HON. KENNETH M. KARAS